

# EXHIBIT “A”



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July 7, 2021

**via E-mail**

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Aamir A. Kazi  
Fish & Richardson P.C.  
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Atlanta, GA 30309

*Re: Kajeet, Inc. v. McAfee Corp.*, Case No. 21-cv-5-MN, In the United States District  
Court for the District of Delaware

Dear Aamir:

As you know, McAfee was required by the Court's Scheduling Order to provide its core technical documents on July 1, 2021 for the products accused by Kajeet in this case. After reviewing the few incomplete documents that McAfee actually produced, it is clear that it did not take this deadline seriously or even attempt to provide the relevant technical documents related to the design and operation of the Accused Products.

In its 4(a) disclosures in this case, Kajeet identified a number of McAfee software products that infringe claim 27 of the '559 patent including but not limited to all versions of the McAfee Safe Family product (including the Safe Family app), as well as all versions of the Total Protection product (such as the Family Bundle or Ultimate Bundle). Kajeet is entitled to receive the internal technical documents that McAfee has for these products and the parental control functionality accused in the Complaint.

On July 1, 2021, McAfee produced only a few documents totaling total 22 pages of non-financial related information. Most of the documents appear to be incomplete or portions of other documents the remainder of which have not been produced. Further, none of these documents describe the internal design or operation of the McAfee server software, the McAfee client software, or the flow of communications between the server and client for the Accused Products. There is no basis for McAfee to represent to Kajeet and to the Court that it has no more than 22 pages of internal design documents related to the Accused Products and functionality described above.

At a minimum, McAfee generates internal technical documentation for several different types for its products. McAfee must have documents related to the design and operation of the products such as technical specifications, functional specifications, product requirements documents, software design documents, software functional specifications, and other design

Aamir A. Akazi

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documents. Kajeet is confident that McAfee maintains these types of documents for the Accused Products and that all of this will come to light in the early stages of discovery. However, the time set by the Court production of these documents was July 1, 2021.

The purpose of the disclosure of these types of documents at this stage of the litigation is to allow Kajeet an opportunity to review them in preparation of its claim charts. It appears that McAfee is refusing to participate in this process, and Kajeet will need to seek recourse from the Court if McAfee does not immediately produce all of these internal technical documents related to the Accused Products. To that end, we need to have a meet and confer no later than 5:00 p.m. central time Friday, July 9, 2021, to discuss the technical documents that McAfee maintains, timing of production, and whether Court assistance will be required. This is imperative given the fast approaching infringement contention deadline. I look forward to hearing from you with a corresponding date and time to talk.

Sincerely,

/s/ Corby R. Vowell

cc: Jonathan T. Suder, Michael T. Cooke, and Richard A. Wojcio, Jr. [firm]